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**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**DRAWN METAL PRODUCTS COMPANY
NILES, ILLINOIS
ILD 000 768 671**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

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TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
EXECUTIVE SUMMARY	ES-1
1.0 INTRODUCTION	1
2.0 FACILITY DESCRIPTION	4
2.1 FACILITY LOCATION	4
2.2 FACILITY OPERATIONS	4
2.3 WASTE GENERATION AND MANAGEMENT	6
2.4 HISTORY OF DOCUMENTED RELEASES	10
2.5 REGULATORY HISTORY	10
2.6 ENVIRONMENTAL SETTING	13
2.6.1 Climate	13
2.6.2 Flood Plain and Surface Water	13
2.6.3 Geology and Soils	13
2.6.4 Ground Water	15
2.7 RECEPTORS	17
3.0 SOLID WASTE MANAGEMENT UNITS	18
4.0 AREAS OF CONCERN	25
5.0 CONCLUSIONS AND RECOMMENDATIONS	26
REFERENCES	30

Attachments

- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C VISUAL SITE INSPECTION FIELD NOTES

LIST OF TABLES

<u>Table</u>		<u>Page</u>
1	SOLID WASTE MANAGEMENT UNITS	7
2	SOLID WASTES	9
3	SWMU SUMMARY	29

LIST OF FIGURES

<u>Figure</u>		<u>Page</u>
1	FACILITY LOCATION	5
2	FACILITY LAYOUT	8

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Drawn Metal Products Company (Drawn Metal) facility in Niles, Cook County, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The Drawn Metal facility manufactures small metal automotive parts such as fuel injection cups and quick connects. Quick connects for automobiles include air conditioning, fuel, and hose connections. Manufacturing operations include stamping, drawing, and punch pressing of various metal automotive parts. Facility operations that generate solid waste include metal product cleaning, reclaiming, stamping, drawing, and punching processes. These processes generate spent trichloroethylene (TCE) (F002), still bottoms containing TCE (F002), and nonhazardous waste oil and scrap metal. The facility is currently in an industrial area and employs about 45 people working two 8-hour shifts.

In late 1956, Joseph Zapf formed Drawn Metal in Niles, Illinois. In 1956, Drawn Metal purchased 1.7 acres of undeveloped land to build a manufacturing facility. From late 1956 to present, the facility was owned by the following companies in succession: Drawn Metal; Microdot, Inc. (Microdot); Northwest Industries; Microdot; and Jahm, Inc. The facility's operations have remained essentially the same since 1956. The facility consists of one manufacturing building with about 34,600 square feet of floor space with a manufacturing area, raw material warehouse area, and office areas, and a parking lot. Facility access is controlled by an electronic alarm system for the manufacturing building. The facility is partially fenced on the east and south of the facility.

Drawn Metal submitted a Notification of Hazardous Waste Activity Form to EPA on August 17, 1980. The notification was as a large-quantity generator of hazardous waste and as a hazardous waste treatment, storage, or disposal (TSD) facility. Drawn Metal submitted a RCRA Part A permit application on January 15, 1985. The RCRA Part A permit application specified a maximum capacity of 3.5 gallons per day of container storage (S01) in the Hazardous Waste Container Storage Area (CSA) (SWMU 1) for F002 waste.

RELEASED
DATE 2/24/22
RIN #
INITIALS S.N.

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On January 21, 1985, Drawn Metal submitted a closure plan for the Hazardous Waste CSA (SWMU 1). The closure plan did not include collecting samples in the area of the Hazardous Waste CSA. On April 1, 1985, the Illinois Environmental Protection Agency (IEPA) approved the closure plan for the Hazardous Waste CSA. On October 23, 1985, Drawn Metal submitted the certification of closure for the Hazardous Waste CSA to IEPA, and on October 28, 1985, IEPA conducted a verification of closure inspection for the Hazardous Waste CSA. IEPA approved the certified closure of the Hazardous Waste CSA on November 15, 1985. The facility currently operates as a small-quantity generator of hazardous waste only.

The PA/VSI identified the following eight SWMUs and no AOCs at the facility:

Solid Waste Management Units

1. Hazardous Waste CSA
2. Distillation System
3. Waste Oil CSA
4. Former Waste CSA
5. Waste Oil Accumulation Area
6. Waste Oil Staging Area
7. Scrap Metal Accumulation Areas
8. Scrap Metal Storage Areas

SWMUs 1, 3, 4, and 8 are located outdoors, and SWMUs 2, 5, 6, and 7 are located indoors. SWMU 1 poses a low potential for release to environmental media (ground water, surface water, air, and on-site soils) because it is RCRA closed and no documented releases have occurred. Also, SWMU 1 is constructed of concrete and is surrounded by an asphalt area. SWMU 3 poses a low potential for release to environmental media because no cracks in the concrete pad or visible evidence of spills were observed. The unit also manages a nonhazardous waste and no documented release have occurred. SWMU 4 is located on gravel but poses a low potential for release to environmental media because no stains on the gravel or evidence of spills were observed. Also, the unit is currently inactive and no documented releases have occurred. SWMU 8 poses a low potential for release to environmental media because no documented releases from this unit have occurred and the unit manages nonhazardous waste. Nonhazardous waste oil stains were observed on the concrete pad and on the facility's outside wall during the VSI. Also, some cracks were observed in the concrete pad.

SWMUs 2, 5, 6, and 7 pose a low potential for release to environmental media because they are indoors on a concrete floor and no cracks in the concrete floor or visible evidence of spills were observed.

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DATE 2/24/22
RIN #
INITIALS JD.

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Sensitive environments are not located on-site. The closest sensitive environment is a forest preserve that surrounds the North Branch Chicago River and is located about 1.0 mile west of the facility. The North Branch Chicago River flows southeast towards Lake Michigan, curves west, and eventually empties into the Des Plaines River. The nearest surface water body, a pond, is located about 100 feet west of the facility and is used for surface water runoff. The nearest residential area is located about 0.25 mile southeast of the facility. Cook County water supplies come from Lake Michigan. No drinking water wells are located within 3 miles of the facility. The facility has one on-site industrial ground-water well. According to a facility representative, the well is about 60 feet deep and is artesian. The well supplies noncontact cooling water used in the facility's air compressor, vapor degreaser, and distillation system. No current data is available on ground-water flow because of the minimal use of ground-water wells in the area. The facility has had no documented releases to ground water, surface water, air, and on-site soils.

No further actions are recommended for SWMUs 1, 2, 3, 4, 5, 6, 7, and 8.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the of prioritizing facilities for corrective action. Through the PA/VSI, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Drawn Metal Products Company (Drawn Metal) facility (EPA Identification No. ILD 000 768 671) in Niles, Cook County, Illinois. The PA was completed on January 12, 1993. PRC gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. Additional sources of information were obtained from the Federal Emergency Management Agency (FEMA), the U.S. Department of Agriculture (USDA), the U.S. Department of Commerce (DOC), and the U.S. Geological Survey (USGS). The VSI was conducted on January 26, 1993. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified eight SWMUs and no AOCs at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and eleven inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

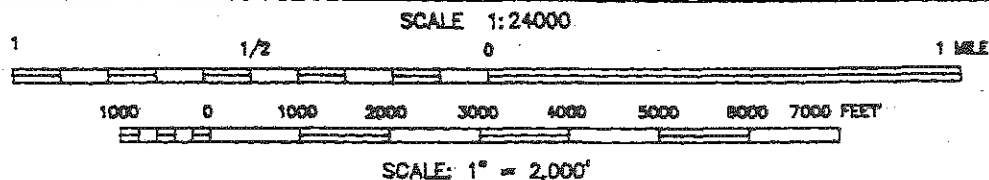
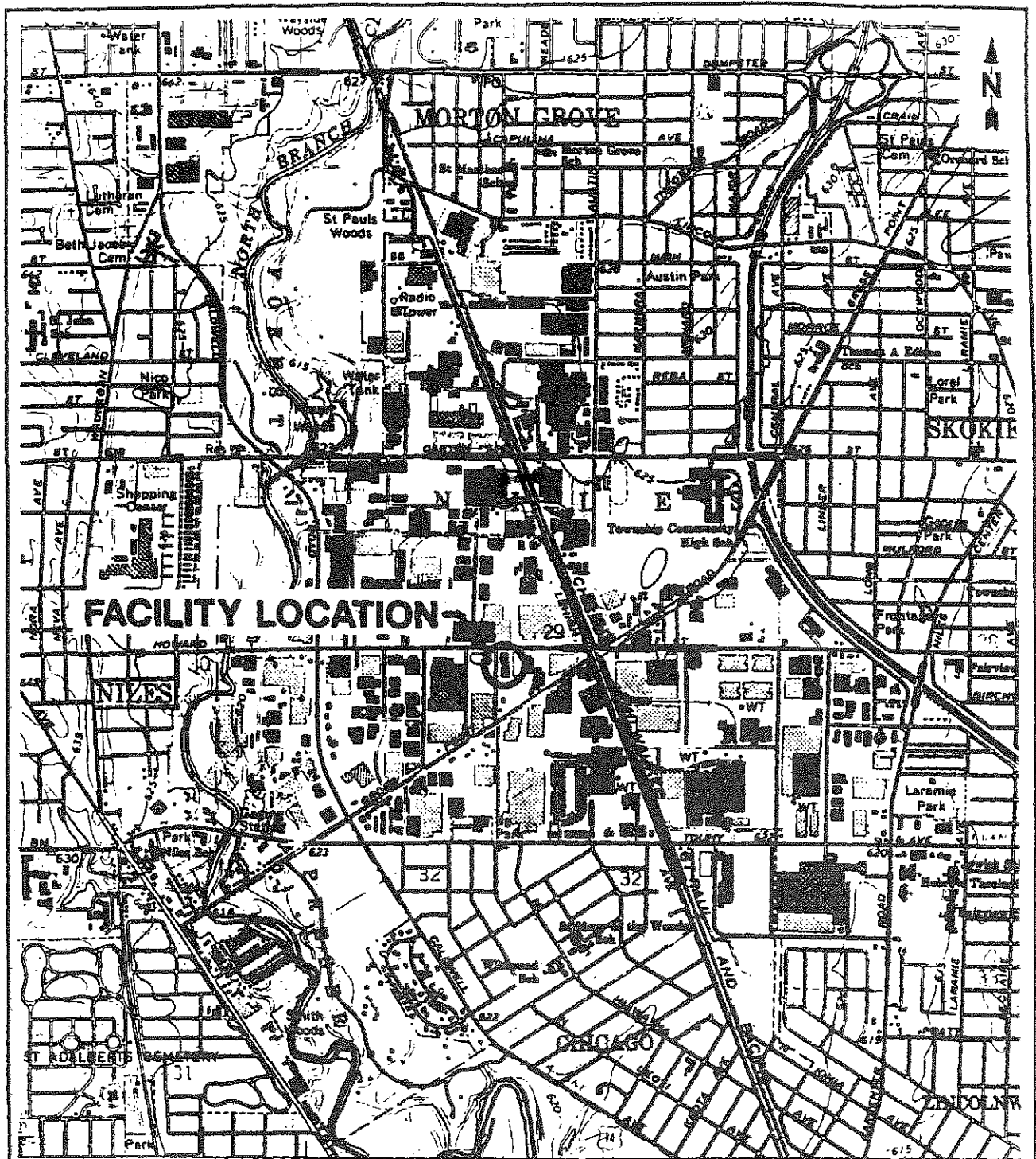
The Drawn Metal facility is located at 6143 West Howard Street in Niles, Cook County, Illinois. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 42° 01' 10" N and longitude 87° 46' 53" W). The facility occupies 1.7 acres in an industrial area.

The facility is bordered on the north by nuArc Graphic Art Equipment, on the west by GTS Schmidt and a pond, on the south by an automotive impound, and on the east by Universal Press, Inc.

2.2 FACILITY OPERATIONS

The Drawn Metal facility manufactures small metal automotive parts such as fuel injection cups and quick connects. Quick connects for automobiles include air conditioning, fuel, and hose connections. Manufacturing operations include stamping, drawing, and punch pressing of various metal automotive parts. Facility operations that generate solid waste include metal product cleaning, reclaiming, stamping, drawing, and punching processes. These processes generate spent trichloroethylene (TCE) (F002), still bottoms containing TCE (F002), and nonhazardous waste oil and scrap metal. The Drawn Metal facility has one less than 90-day Hazardous Waste Container Storage Area (CSA) (SWMU 1), a Distillation System (SWMU 2), one nonhazardous Waste Oil CSA (SWMU 3), over twenty nonhazardous waste accumulation areas (SWMUs 5 and 7), one nonhazardous Waste Oil Staging Area (SWMU 6), and nonhazardous Scrap Metal Storage Areas (SWMU 8). The facility also has a Former Waste CSA (SWMU 4). The facility is currently in an industrial area and employs about 45 people working two 8-hour shifts.

In late 1956, Joseph Zapf formed Drawn Metal in Niles, Illinois. In 1956, Drawn Metal purchased 1.7 acres of undeveloped land to build a manufacturing facility. From late 1956 to present, the facility was owned by the following companies in succession: Drawn Metal; Microdot, Inc. (Microdot); Northwest Industries (Northwest); Microdot; and Jahm, Inc. (Jahm). The facility's operations have remained essentially the same since 1956. In late 1976,



SOURCE: MODIFIED FROM USGS,
PARK RIDGE, ILLINOIS, QUADRANGLE, 1980



QUADRANGLE LOCATION

DRAWN METAL PRODUCTS COMPANY
NILES, ILLINOIS

FIGURE 1
FACILITY LOCATION

PMC ENVIRONMENTAL MANAGEMENT, INC.

Microdot purchased Drawn Metal. In late 1978, Northwest purchased Microdot and all of its divisions. Drawn Metal's name has not changed from late 1956 to present. In 1984, Microdot was reformed and repurchased all of its former divisions, including Drawn Metal. In 1989, Jahm, located in Madison Heights, Michigan, purchased three divisions of Microdot, including Drawn Metal. The facility consists of one manufacturing building with about 34,600 square feet of floor space with a manufacturing area, raw material warehouse area, and office areas, and a parking lot. Facility access is controlled by an electronic alarm system for the manufacturing building. The facility is partially fenced on the east and south of the facility.

Solid wastes generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

2.3 WASTE GENERATION AND MANAGEMENT

The primary waste streams generated at the Drawn Metal facility are from metal product cleaning, reclaiming, stamping, drawing, and punching processes. The facility generates still bottoms containing TCE (F002) from the reclamation of spent TCE (F002). Nonhazardous waste streams include waste oil and scrap metal. Wastes are generated and managed at various locations at the facility. SWMUs and their current status are identified in Table 1. The locations of SWMUs in relation to the facility layout are shown in Figure 2. Wastes generated at the facility are summarized in Table 2. Facility generation and management of both hazardous and nonhazardous wastes are discussed below.

Drawn Metal operates a vapor degreaser that uses TCE to clean various automotive parts. The vapor degreaser is connected to an adjacent Distillation System (SWMU 2) that has operated since 1956. When TCE is spent, it is processed through the Distillation System (SWMU 2) to reclaim the TCE. The reclaimed TCE is recirculated to the vapor degreaser for further cleaning of various automotive parts. Still bottoms containing TCE (F002) are generated by the Distillation System (SWMU 2). Drawn Metal generates about 30 55-gallon steel drums of still bottoms containing TCE annually. This waste is transferred directly from the Distillation System (SWMU 2) to a 55-gallon steel drum and stored for less than 180 days in the Hazardous Waste CSA (SWMU 1). According to a facility representative, from late 1956 to 1980, still bottoms containing TCE were stored for less than 90 days in the Former Waste CSA (SWMU 4). The still bottoms containing TCE were transported off site to Beaver Oil of Hodgkins, Illinois, for treatment. According to a facility representative, from August 1980 to November 1985, the waste was stored for greater than 90 days in the Hazardous CSA (SWMU 1). This waste is transported off site to Detrex Corporation (Detrex) of Melrose Park, Illinois, for treatment.

TABLE 1
SOLID WASTE MANAGEMENT UNITS

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit^a</u>	<u>Status</u>
1	Hazardous Waste CSA	Yes	Active; certified closed in November 1985; less than 180-day storage of hazardous waste
2	Distillation System	No	Active; reclamation of hazardous waste
3	Waste Oil CSA	No	Active; storage of nonhazardous waste
4	Former Waste CSA	No	Inactive
5	Waste Oil Accumulation Area	No	Active; accumulation of nonhazardous waste
6	Waste Oil Staging Area	No	Active; temporary storage of nonhazardous waste before off-site transport
7	Scrap Metal Accumulation Areas	No	Active; accumulation of nonhazardous waste
8	Scrap Metal Storage Areas	No	Active; storage of nonhazardous waste

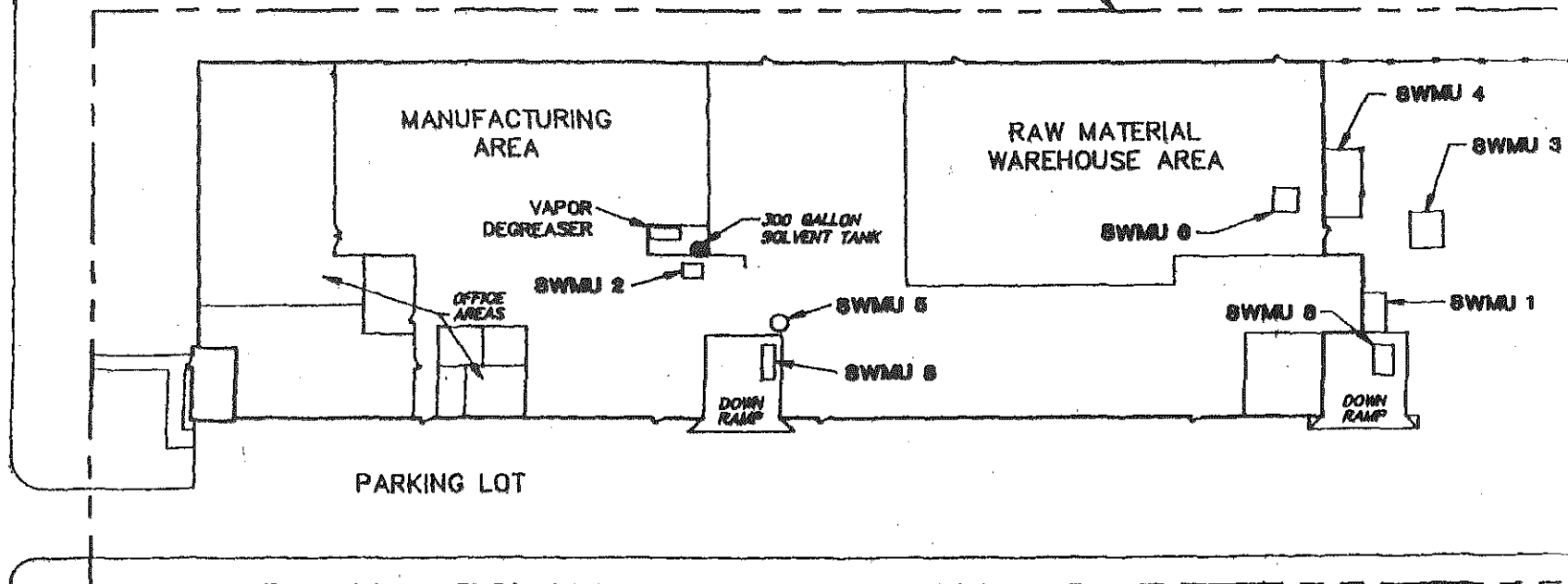
Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

← Z →

PROPERTY LINE

Howard St.



<u>SWMU NO.</u>	<u>SWMU NAME</u>
SWMU 1	HAZARDOUS WASTE CSA
SWMU 2	DISTILLATION SYSTEM
SWMU 3	WASTE OIL CSA
SWMU 4	FORMER WASTE CSA
SWMU 5	WASTE OIL ACCUMULATION AREA
SWMU 6	WASTE OIL STAGING AREA
SWMU 7	SCRAP METAL ACCUMULATION AREAS
SWMU 8	SCRAP METAL STORAGE AREAS

NOTE: Scrap Metal Accumulation Areas (SWMU 7) are located throughout the facility

DRAWN METAL PRODUCTS COMPANY
NILES, ILLINOIS

FIGURE 2
FACILITY LAYOUT

NOT TO SCALE

EMC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Solid Waste Management Unit</u>
Spent TCE/F002	Parts cleaning	SWMU 2
Still bottoms containing TCE/F002	Distillation System	SWMUs 1 and 4
Waste Oil/NA	Stamping, drawing, and punching processes	SWMUs 3, 4, 5, and 6
Scrap Metal/NA	Stamping, drawing, and punching processes	SWMUs 7 and 8

Note:

^a Not applicable (NA) designates nonhazardous waste.

Nonhazardous waste oil and scrap metal are generated from stamping, drawing, and punching processes during the manufacture of the small automotive parts. Drawn Metal generates about 150 55-gallon drums of waste oil annually. Waste oil is accumulated in a 55-gallon steel drum in the Waste Oil Accumulation Area (SWMU 5). When the 55-gallon drum is full, it is transferred to the Waste Oil CSA (SWMU 3). From late 1956 to 1988, the waste oil was stored in the Former Waste CSA (SWMU 4). During the colder months, before the waste is transported off site, it is transferred to the Waste Oil Staging Area (SWMU 6). The waste oil is transported off site to Beaver Oil and Sludge Company (Beaver Oil) of Hodgkins, Illinois, for recycling.

Scrap metals such as steel and small amounts of aluminum and brass are generated from stamping, drawing, and punching processes. The scrap metals are accumulated in 1- to 2-cubic-yard containers at the Scrap Metal Accumulation Areas (SWMU 7) throughout the manufacturing building. The facility has over 20 scrap metal accumulation areas. When the 1- to 2-cubic-yard container is full, scrap metal is transferred to one of two outdoor 10- to 20-cubic-yard roll-off boxes in the Scrap Metal Storage Areas (SWMU 8). Drawn Metal generates about 1,500 cubic yards of scrap metal annually. The scrap metal is transported off site to Jacobson Iron and Steel Company, Inc. of Chicago, Illinois, for recycling.

2.4 HISTORY OF DOCUMENTED RELEASES

The facility has no history of documented releases to ground water, surface water, air, or on-site soil.

2.5 REGULATORY HISTORY

Drawn Metal submitted a Notification of Hazardous Waste Activity Form to EPA on August 17, 1980. The notification was as a large-quantity generator of hazardous waste and as a hazardous waste treatment, storage, or disposal (TSD) facility (Drawn Metal, 1980). On September 28, 1982, EPA informed Drawn Metal that the facility was required to submit a Part A permit application to the EPA Regional Administrator by November 19, 1980, in accordance with 40 CFR 122.22. This requirement applies to TSD facilities in existence on or before November 19, 1980. Therefore, the facility may be in violation of operating without a hazardous waste permit. However, EPA also stated that Drawn Metal may have erroneously marked the TSD box on the RCRA notification form and requested that the facility inform EPA of its current status (EPA, 1982).

On June 14, 1983, IEPA informed Drawn Metal that the facility may be in violation of not filing the 1982 Annual Hazardous Waste Report for a TSD facility (IEPA, 1983). On July 15, 1983, Drawn Metal informed IEPA that the facility is a small-quantity generator of hazardous waste and is not required to submit an annual hazardous report (Drawn Metal, 1983). PRC found no documentation during federal, state, and local file reviews that indicates that the facility submitted an annual hazardous waste report for 1982.

On July 26, 1984, IEPA inspected the Drawn Metal facility for RCRA compliance. The Drawn Metal facility was found in violation for lack of a closure plan with cost estimates, an operating record, a contingency plan, a waste analysis plan, posted warning signs, an emergency coordinator, an inspection log, and evidence of financial assurance. The Hazardous Waste CSA (SWMU 1) was also less than 50 feet from the property line (IEPA, 1984a and 1984b).

On September 6, 1984, as a result of the RCRA compliance inspection conducted on July 26, 1984, Drawn Metal responded to IEPA regarding its current regulatory status. Drawn Metal informed IEPA that the facility misclassified itself as a TSD facility and that the facility's current regulatory status is as a small-quantity generator only. Drawn Metal also requested a review of the facility's classification (Drawn Metal, 1984).

On November 16, 1984, IEPA requested a Pre-Enforcement Conference with the Drawn Metal facility regarding noncompliance with violations discovered during the RCRA inspection conducted on July 26, 1984 (IEPA, 1984c). As a result of the meeting, on December 3, 1984, the Drawn Metal facility agreed to submit a Part A permit application by January 15, 1985, and a closure plan by January 22, 1985. The facility also agreed to have the waste oil waste stream analyzed for hazardous constituents (IEPA, 1984d).

Drawn Metal submitted a RCRA Part A permit application on January 15, 1985 (Drawn Metal, 1985a). The RCRA Part A permit application specified a maximum capacity of 3.5 gallons per day of container storage (S01) in the Hazardous Waste CSA (SWMU 1) for F002 waste. On January 21, 1985, Drawn Metal submitted a closure plan for the Hazardous Waste CSA (SWMU 1) (Drawn Metal, 1985b). On February 10, 1985, IEPA published a public notice for the Hazardous Waste CSA. No public comments were received (IEPA, 1985b).

On March 8, 1985, IEPA informed Drawn Metal that the agency had received the facility's Part A permit application and closure plan for the Hazardous Waste CSA (SWMU 1); however, the agency did not receive the waste analysis for the waste oil as required (IEPA, 1985a). The closure plan did not include collecting samples in the area of the Hazardous CSA. On March 18, 1985, Drawn Metal submitted to IEPA Material Safety Data Sheets (MSDS) for the

waste oil (Drawn Metal, 1985c). The facility also stated that the facility has a maximum capacity of 300 gallons of hazardous waste storage capacity and that the facility has had no documented releases (Drawn Metal, 1985d).

On April 1, 1985, IEPA approved the closure plan for the Hazardous Waste CSA (SWMU 1) (IEPA, 1985c). On April 22, 1985, IEPA informed Drawn Metal that the facility was required to analyze its waste oil (IEPA, 1985d). On September 20, 1985, Drawn Metal submitted to IEPA the waste analysis of the waste oil (Drawn Metal, 1985e). According to analytical results, the waste oil is nonhazardous. During the VSI, a facility representative stated that the facility shipped the wastes to the same off-site facility, but never mixed waste oil and still bottoms containing TCE (F002) and currently does not mix waste oil and still bottoms containing TCE (F002) in 55-gallon drums; therefore, the waste oil was never considered hazardous by the facility.

On October 22, 1985, Eldredge Engineering Associates, Inc., certified the closure of the Hazardous Waste CSA (SWMU 1) for Drawn Metal (Eldredge, 1985). On October 23, 1985, Drawn Metal submitted the certification of closure for the Hazardous Waste CSA (SWMU 1) to IEPA (Drawn Metal, 1985f). On October 28, 1985, IEPA conducted a verification of closure inspection for the Hazardous Waste CSA (SWMU 1) and approved the certified closure of this unit on November 15, 1985 (IEPA, 1985e). IEPA also informed the facility that it must meet the requirements as a small-quantity generator of hazardous waste only (IEPA, 1985f).

On March 3, 1986, IEPA sent Drawn Metal an Enforcement Notice Letter for noncompliance with regulations discovered during the July 26, 1984, RCRA compliance inspection and also requested an enforcement meeting regarding the facility's noncompliance with regulations (IEPA, 1986a). On April 2, 1986, Drawn Metal met with IEPA regarding noncompliance with the facility's contingency plan and personnel training program. IEPA decided that the facility's contingency plan and personnel training program were both inadequate (IEPA, 1986b and 1986c). However, the facility responded to these deficiencies and achieved compliance (IEPA, 1986d). The facility currently operates as a small-quantity generator of hazardous waste only.

PRC found no documentation of operating air permits, odor complaints from area residents, other operating permits, underground storage tanks, or CERCLA activity at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the Drawn Metal facility.

2.6.1 Climate

The climate in Cook County is continental. The average daily temperature is 49 °F. The lowest average daily temperature is 21.1 °F in January. The highest average daily temperature is 72.2 °F in July.

The majority of the area's precipitation occurs between April and September. The total annual precipitation for the county is 33 inches (USDA, 1976). The mean annual lake evaporation for the area is about 30 inches (DOC, 1968).

The 1-year, 24-hour maximum rainfall is about 4.62 inches. Prevailing winds are from the north-northwest in winter and from the south in the summer. The mean annual wind speed is 9.7 miles per hour (DOC, 1980).

2.6.2 Flood Plain and Surface Water

The Drawn Metal facility is not located in a 100-year flood plain (FEMA, 1979). The nearest surface water body, a pond, is located about 100 feet west of the facility and is used for surface water runoff. The North Branch Chicago River is located about 1.0 mile west of the facility. The North Branch Chicago River flows southeast towards Lake Michigan, curves west, and eventually empties into the Des Plaines River. The Drawn Metal facility does not have a National Pollutant Discharge Elimination System (NPDES) permit.

2.6.3 Geology and Soils

No site-specific geology or soils information is available. The following paragraphs discuss the regional geology and soils of Cook County.

The structural geology of the area is relatively simple. Generally, rocks dip eastward at 10 to 15 feet per mile, with minor east-to-west trending flexures. A major structural feature is present, known as the Des Plaines Disturbance in northern Cook County. The Des Plaines Disturbance is an area of complex faulting. Ground water flow may be restricted in this area and local effects may be difficult to predict.

Erosion of the bedrock surface before glaciation produced deep valleys, many of which now are filled with glacial drift. Because of this erosion, the thickness of the upper unit of the bedrock may change abruptly over short distances. Main rock units present in the shallow and deep bedrock aquifer systems in the area are the Silurian dolomite, the Maquoketa Group, the Ironton-Galesville, the Eau Claire Formation, and the Mt. Simon aquifer systems.

The Silurian dolomite unconformably overlies rocks of the Maquoketa Group and is overlain by the glacial drift. Fracturing is common in these rocks, particularly in the upper portion. The Silurian Dolomite is subdivided into the Niagaran Series and the underlying Alexandrian Series. The Niagaran Series consists of 20 feet of light buff, very fine crystalline to granular porous dolomite. This dolomite is relatively pure to silty and compact to porous with some dolomitic siltstone. The rocks of the Alexandrian Series consist of 40 to 50 feet of light gray to yellowish tan, very finely crystalline, slightly silty, slightly porous to compact dolomite overlying gray to brown, very fine, granular, silty to very silty compact dolomite and locally dolomitic siltstone.

The Maquoketa Group underlies the Silurian dolomite and is up to 250 feet thick. The Maquoketa Group consists of soft shale interbedded with dolomite, brittle dolomite shale, and siltstone. The materials comprising the upper portion of the group are quite variable, but the beds near the base are more consistent with relatively impermeable shales. These beds are generally more than 30 feet thick.

The upper portion of the Ironton-Galesville is approximately 100 to 275 feet thick and consists of clean, medium- to coarse-grained, partly dolomitic, moderately to poorly sorted sandstone. White to light buff, clean to slightly silty, fine-grained, moderately well sorted, and largely nondolomitic sandstone comprise the lower portion of the Ironton-Galesville.

The Eau Claire Formation is composed of a variety of rock types including sandstone, siltstone, dolomite, and shale in its upper and middle portions. The lower portion of the Eau Claire Formation is composed of sandstone similar to those in the underlying Mt. Simon Sandstone. The Mt. Simon Sandstone is approximately 2,000 feet thick and consists of fine- to coarse-grained sandstone commonly poorly sorted with occasional small pebbles. The Potsdam Megagroup consists of the Mt. Simon Sandstone and the lower portion of the Eau Claire Formation. The Potsdam Megagroup is equivalent to the Mt. Simon aquifer system (Hughes and others, 1966).

The area in general consists of built-up and deep, level to undulating, well-drained and poorly-drained soils that have a loamy, silty, or sandy subsoil in glacial outwash and in glacial lake sediment. The Drawn Metal facility is in an area that consists of 50 percent urban land, 20 percent Selma soils, 20 percent Oakville soils, and 10 percent of various minor soils.

Urban land consists of buildings and pavements that obscure or alter the soils. In most places, Selma soils occupy slightly lower positions than Oakville soils, Selma soils are poorly drained, and Oakville soils are well drained. Selma soils have a surface layer of loam, whereas Oakville soils have a surface layer of sand. Many of the soils in this unit contain layer of silt. These layers are soft and compressible when wet.

The minor soils in the unit are the Orthents loamy, the very poorly drained and poorly drained Gilford and Milford soils, and the somewhat poorly drained Hoopston, Watseka, and Wesley soils. Most areas are residential or used for public facilities and other works and structures. A few small tracts of land are idle or vacant. Some areas are in small estates or homesites with relatively large lots. Wetness is the main limitation of urban development and other applications in areas covered with Selma soils. No severe limitations of urban development exist on Oakville soils. The well drained soils on ridges have very good potential for urban development and consist of about one third of the soil in Cook County. About one third of the soils have a fair potential for constructing residences without basements and small commercial buildings. Another third of the soils have poor potential for urban development because of wetness (USDA, 1976).

2.6.4 Ground Water

No site-specific ground-water information is available. The following paragraphs discuss the regional ground-water setting of Cook County.

Ground water is obtained from three major sources: glacial drift aquifers, shallow dolomite aquifers, and deep sandstone aquifers. In 1962, about 11 percent of the total ground water was drawn from glacial drift wells, 37 percent from shallow dolomite wells, and 52 percent from deep sandstone wells.

The shallow bedrock aquifer system consists of bedrock units that commonly directly underlie the glacial drift and are recharged locally by precipitation. The major units in this system are the Silurian dolomite, which yields most of the county's ground water, and the Maquoketa Group, which underlies the Silurian dolomite and separates the shallow bedrock aquifer system from underlying deep bedrock aquifer systems. The Maquoketa Group consists

mainly of shales and dolomites. The upper boundary of the shallow bedrock aquifer system is the top layer of bedrock. The lower boundary of the aquifer is the top of the Galena-Platteville Dolomite except where the Galena-Platteville Dolomite is the uppermost bedrock layer and subject to local recharge. In these areas, the upper portion of the Galena-Platteville Dolomite is more permeable, and the lower boundary of the shallow bedrock aquifer system lies within this dolomite.

The deep bedrock aquifer systems consists of the Cambrian-Ordovician and Mt. Simon aquifer systems. These units recharge where they crop out at the surface or where they immediately underlie the glacial drift to the west and north. In addition, the units gain water from downward leakage through the Maquoketa Group. The upper unit of the deep bedrock aquifer system is the Galena-Platteville Dolomite; the base of the lower unit is the top of Precambrian Era crystalline rock. Rocks of lower permeability in the upper and middle portions of the Eau Claire Formation separate the two deep bedrock aquifer systems. Three major sandstone aquifers are present in the two deep bedrock aquifer systems: the Glenwood-St. Peter, the Ironton-Galesville, and the Mt. Simon aquifer systems.

The top of the Cambrian-Ordovician Formation aquifer system is the top portion of or within the Galena-Platteville Dolomite. The Cambrian-Ordovician Formation and the Mt. Simon Sandstone aquifer systems are separated by relatively impermeable shales and dolomites of the upper and middle portions of the Eau Claire Formation. The permeable sands of the lower portion of the Eau Claire Formation are included in the Mt. Simon Sandstone as the Mt. Simon aquifer system. Water in the Mt. Simon aquifer system is present under leaky artesian conditions because of confining beds of the Eau Claire Formation.

The deep bedrock aquifer systems have been used for many years because they supply a relatively dependable and large supply of water of predictable quality. Wells with yields exceeding 700 gallons per minute are not uncommon (Hughes and others, 1966). In the last 10 years, average water levels have declined (USDA, 1976).

Cook County water supplies come from Lake Michigan. No drinking water wells are located within 3 miles of the facility. The facility has one on-site industrial ground-water well. According to a facility representative, the well is about 60 feet deep and is artesian. The well supplies water for the facility's noncontact cooling water used in the facility's air compressor, vapor degreaser, and distillation system. No current data is available on ground-water flow because of the minimal use of ground water in the area.

2.7

RECEPTORS

The facility occupies 1.7 acres in an industrial area in Niles, Illinois. Niles has a population of about 29,000 people.

The facility is bordered on the north by nuArc Graphic Art Equipment, on the west by GTS Schmidt and a pond, on the south by an automotive impound, and on the east by Universal Press, Inc. The nearest residential area is located about 0.25 mile southeast of the facility. Facility access is controlled by an electronic alarm system for the manufacturing building. The facility is partially fenced on the east and south of the facility.

Sensitive environments are not located on-site. The closest sensitive environment is a forest preserve that surrounds the North Branch Chicago River and is located about 1.0 mile west of the facility. The North Branch Chicago River flows southeast towards Lake Michigan, curves west, and eventually empties into the Des Plaines River. The nearest surface water body, a pond, is located about 100 feet west of the facility and is used for surface water runoff. The nearest residential area is located about 0.25 mile southeast of the facility. Cook County water supplies come from Lake Michigan. No drinking water wells are located within 3 miles of the facility. The facility has one on-site industrial ground-water well. According to a facility representative, the well is about 60 feet deep and is artesian. The well supplies noncontact cooling water used in the facility's air compressor, vapor degreaser, and distillation system. No current data is available on ground-water flow because of the minimal use of ground-water wells in the area.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the eight SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Hazardous Waste CSA

Unit Description: This unit is outdoors in the southwestern portion of the facility. The unit consists of 55-gallon steel drums on a concrete pad and measures about 10 by 20 feet. Currently, this unit operates as a less than 180-day storage area of hazardous waste.

Date of Startup: This unit began operation in 1980.

Date of Closure: In April 1985, IEPA approved the closure plan for the unit and the unit was certified closed in November 1985. The unit is currently used as a less than 180-day storage area. According to a facility representative, from late 1956 to 1980, still bottoms containing TCE (F002) were stored for less than 90 days in the Former Waste CSA (SWMU 4).

Wastes Managed: This unit manages still bottoms containing TCE (F002) generated from the Distillation System (SWMU 2). The waste is transported off site to Detrex of Melrose Park, Illinois, for treatment.

Release Controls: The unit is located on a concrete pad surrounded by an asphalt area.

History of Documented Releases: No releases from this unit have been documented.

Observations: During the VSI, the unit contained three wooden pallets. The area south of the unit contained one 55-gallon drum of still bottoms containing TCE (F002) during the VSI. According to a facility representative, the 55-gallon drum of still bottoms containing TCE was temporarily outside the unit because the unit had recently been

shovelled after heavy snowfall during the previous week. The area around the unit consists of a concrete pad, which is surrounded by an asphalt area. No cracks in the concrete pad or visible evidence of spills were observed (see Photographs No. 1 and 2).

SWMU 2

Distillation System

Unit Description:

This unit is indoors in the central portion of the facility and is on a concrete floor. The unit measures about 2 feet by 5 feet by 5 feet, and is constructed of steel. The system has a capacity of about 100 gallons. The unit is located next to a vapor degreaser that it is connected to, and a wall separates the unit from the vapor degreaser. The unit reclaims spent TCE (F002) and recirculates it to the vapor degreaser for further use in cleaning various metal parts.

Date of Startup:

According to facility representatives this unit began operating in late 1956, when facility operations began.

Date of Closure:

This unit is active.

Wastes Managed:

This unit reclaims spent TCE (F002) from metal parts cleaning. Still bottoms containing TCE (F002) generated during the reclamation process is transferred directly from the unit into 55-gallon drums and stored for less than 180 days in the Hazardous Waste CSA (SWMU 1). According to a facility representative, from August 1980 to November 1985, the waste was stored for greater than 90 days in the Hazardous CSA (SWMU 1). The waste is transported off site to Detrex of Melrose Park, Illinois, for treatment.

Release Controls:

This unit is located indoors on a concrete floor. No floor drains were visible in the area during the VSI.

History of Documented Releases:

No releases from this unit have been documented.

Observations: The unit contained about 75 gallons of spent TCE during the VSI. No cracks in the concrete floor or visible evidence of spills were observed (see Photograph No. 3).

SWMU 3 Waste Oil CSA

Unit Description: This unit is outdoors in the south-central portion of the facility. The unit consists of 55-gallon drums on a concrete area that measures about 20 by 20 feet. This unit operates as a storage area of nonhazardous waste.

Date of Startup: This unit began operation in 1988.

Date of Closure: This unit is active.

Wastes Managed: This unit manages nonhazardous waste oil. The waste is transported off site to Beaver Oil of Hodgkins, Illinois, for recycling.

Release Controls: This unit is located on a concrete pad surrounded by an asphalt area.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained 10 55-gallon drums of nonhazardous waste oil during the VSI. The area around the unit is asphalt. No cracks in the concrete pad or visible evidence of spills were observed (see Photographs No. 2 and 4).

SWMU 4 Former Waste CSA

Unit Description: This unit is outdoors in the southeastern portion of the facility. This unit consisted of 55-gallon steel drums of still bottoms containing TCE (F002) and nonhazardous waste oil stored on a gravel area that measures about 20 by 30 feet. Currently, this unit stores empty 55-gallon steel drums and equipment.

Date of Startup:	According to facility representatives this unit began operating in late 1956, when facility operations began.
Date of Closure:	This unit is inactive; the facility discontinued using the unit in 1988.
Wastes Managed:	This unit formerly managed still bottoms containing TCE (F002) and nonhazardous waste oil and currently stores empty 55-gallon steel drums and equipment. The still bottoms containing TCE (F002) and waste oil were transported off site to Beaver Oil of Hodgkins, Illinois, for treatment and recycling, respectively. The still bottoms containing TCE (F002) is currently stored in the Hazardous CSA (SWMU 1) and is transported off site to Detrex of Melrose Park, Illinois, for treatment. The waste oil is currently transported off site to Beaver Oil of Hodgkins, Illinois, for recycling.
Release Controls:	The unit has no release controls.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained about seven empty 55-gallon steel drums during the VSL. PRC noted no stains on the soil or evidence of spills. The area around the unit is a concrete pad to the west and southwest and asphalt to the south and east (see Photographs No. 2 and 5).
SWMU 5	Waste Oil Accumulation Area
Unit Description:	This unit is indoors in the central portion of the facility and consists of a 55-gallon steel drum on a concrete floor. The unit measures about 4 by 4 feet and operates as an accumulation area for nonhazardous waste.
Date of Startup:	According to facility representatives this unit began operating in late 1956, when facility operations began.
Date of Closure:	This unit is active.

Wastes Managed: This unit manages nonhazardous waste oil. The waste is transported off site to Beaver Oil of Hodgkins, Illinois, for recycling.

Release Controls: This unit is located indoors on a concrete floor.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained one partially full, 55-gallon steel drum of nonhazardous waste oil during the VSI. The unit is next to the dock area. No cracks in the concrete floor or visible evidence of spills were observed (see Photograph No. 6).

SWMU 6 Waste Oil Staging Area

Unit Description: This unit is indoors in the southeastern portion of the facility. This unit consists of 55-gallon steel drums on a concrete floor and measures about 15 by 15 feet. During the colder months, the unit operates as a temporary storage area for nonhazardous waste before the waste is transported off site.

Date of Startup: According to facility representatives this unit began operating in late 1956, when facility operations began.

Date of Closure: This unit is active.

Wastes Managed: This unit manages nonhazardous waste oil from stamping, drawing, and punching processes. The waste is transported off site to Beaver Oil of Hodgkins, Illinois, for recycling.

Release Controls: This unit is located indoors on a concrete floor.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained 14 55-gallon drums of waste oil during the VSI. No cracks in the concrete floor or visible evidence of spills were observed (see Photograph No. 7).

SWMU 7 Scrap Metal Accumulation Areas

Unit Description: This unit is indoors and consists of about 20 1- to 2-cubic-yard containers on a concrete floor. This unit operates as an accumulation area for nonhazardous waste.

Date of Startup: According to facility representatives this unit began operating in late 1956, when facility operations began.

Date of Closure: This unit is active.

Wastes Managed: This unit manages nonhazardous scrap metal. The scrap metal is transported off site to Jacobson Iron and Steel Company, Inc., of Chicago, Illinois, for recycling.

Release Controls: This unit is located on a concrete floor.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained about 1 cubic yard of scrap metal during the VSI. The scrap metal in the unit was covered with nonhazardous waste oil. No cracks in the concrete floor or visible evidence of spills were observed (see Photographs No. 8 and 9).

SWMU 8 Scrap Metal Storage Areas

Unit Description: This unit is outdoors in the southwestern and west-central portion of the facility. This unit consists of two 10- to 20-cubic-yard roll-off boxes on an outdoor concrete pad. The unit is located on two separate, approximately 30-degree-angle down ramps.

Date of Startup: According to facility representatives this unit began operating in late 1956, when facility operations began.

Date of Closure: This unit is active.

Wastes Managed: This unit manages nonhazardous scrap metal from the stamping, drawing, and punching processes. The scrap metal is transported off site to Jacobson Iron and Steel Company, Inc., of Chicago, Illinois, for recycling.

Release Controls: This unit is located on a concrete pad.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained about 8 cubic yards of scrap metal in each roll-off box during the VSI. PRC noted some cracks in the concrete pad. Also, nonhazardous waste oil stains were observed on the concrete pad and on the facility's outside wall (see Photographs No. 10 and 11).

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

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5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified eight SWMUs and no AOCs at the Drawn Metal facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1 Hazardous Waste CSA

Conclusions: This unit is outdoors on a concrete pad in the southwestern portion of the facility and currently operates as a less than 180-day hazardous waste storage area. This unit was RCRA closed in November 1985 and no documented releases have occurred. Wastes are currently stored in closed 55-gallon drums on a concrete pad surrounded by an asphalt area. The potential for release of hazardous constituents to ground water, surface water, air, and on-site soils from this unit is low.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 2 Distillation System

Conclusions: This unit is indoors on a concrete floor in the central portion of the facility. This unit is constructed of steel and has a capacity of about 100 gallons. The unit is next to a vapor degreaser that it is connected to, and a wall separates the unit and the vapor degreaser. The unit reclaims spent TCE and recirculates TCE to the vapor degreaser for further use in cleaning various metal parts. The unit is located indoors on a concrete floor and no cracks in the concrete floor or visible evidence of spills were observed. No documented releases from this unit have occurred. The potential for release of hazardous constituents to ground water, surface water, air, and on-site soils from this unit is low.

Recommendations: PRC recommends no further action for this SWMU at this time.

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SWMU 3

Waste Oil CSA

Conclusions:

This unit is outdoors on a concrete pad in the south-central portion of the facility and currently operates as a nonhazardous waste storage area. During the VSI, no cracks in the concrete pad or visible evidence of spills were observed. No documented releases from this unit have occurred. The potential for release of hazardous constituents to ground water, surface water, air, and on-site soils from this unit is low.

Recommendations:

PRC recommends no further action for this SWMU at this time.

SWMU 4

Former Waste CSA

Conclusions:

This unit is outdoors on gravel in the southeastern portion of the facility and currently operates as a storage area for empty 55-gallon steel drums and various equipment. During the VSI, no stains on the gravel or evidence of spills were observed. No documented releases from this unit have occurred. The potential for a release to ground water, surface water, air, and on-site soils from this unit is low.

Recommendations:

PRC recommends no further action for this SWMU at this time.

SWMU 5

Waste Oil Accumulation Area

Conclusions:

This unit is indoors on a concrete floor in the central portion of the facility and operates as a nonhazardous waste storage area. During the VSI, no cracks in the concrete floor or visible evidence of spills were observed. No documented releases from this unit have occurred. The potential for release of hazardous constituents to ground water, surface water, air, and on-site soils from this unit is low.

Recommendations:

PRC recommends no further action for this SWMU at this time.

SWMU 6

Waste Oil Staging Area

Conclusions:

This unit is indoors on a concrete floor in the southeastern portion of the facility and operates as a temporary storage area for nonhazardous waste before off-site shipment. During the VSI, no cracks in the concrete floor

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or visible evidence of spills were observed. No documented releases from this unit have occurred. The potential for a release to ground water, surface water, air, and on-site soils from this unit is low.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 7 Scrap Metal Accumulation Areas

Conclusions: This unit is present indoors and throughout the facility and consists of about 20 1- to 2-cubic-yard containers on a concrete floor. This unit operates as a storage area for nonhazardous waste. During the VSI, no cracks in the concrete floor or visible evidence of spills were observed. No documented releases from this unit have occurred. The potential for release of hazardous constituents to ground water, surface water, air, and on-site soils from this unit is low.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 8 Scrap Metal Storage Areas

Conclusions: This unit consists of two 10- to 20-cubic-yard roll-off boxes on a concrete pad. This unit operates as a storage area for nonhazardous waste. The unit is located on two separate, approximately 30-degree-angle down ramps in the southwestern and west-central portion of the facility. During the VSI, nonhazardous waste oil stains were observed on the concrete pad and on the facility's outside wall. Also, some cracks were observed in the concrete pad. No documented releases from this unit have occurred. The potential for a release to ground water, surface water, air, and on-site soils from this unit is low.

Recommendations: PRC recommends no further action for this SWMU at this time.

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TABLE 3
SWMU SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Hazardous Waste CSA	1980 to present	None	No further action at this time
2. Distillation System	Late 1956 to present	None	No further action at this time
3. Waste Oil CSA	1988 to present	None	No further action at this time
4. Former Waste CSA	Late 1956 to 1988	None	No further action at this time
5. Waste Oil Accumulation Area	Late 1956 to present	None	No further action at this time
6. Waste Oil Staging Area	Late 1956 to present	None	No further action at this time
7. Scrap Metal Accumulation Areas	Late 1956 to present	None	No further action at this time
8. Scrap Metal Storage Areas	Late 1956 to present	None	No further action at this time

REFERENCES

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- Drawn Metal, 1983. Letter to Illinois Environmental Protection Agency (IEPA) Regarding the Facility's Annual Hazardous Waste Reports, July 15.
- Drawn Metal, 1984. Letter to IEPA Stating that the Facility Violations Discovered during the RCRA Compliance Inspection do not Pertain to the Facility, September 6.
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- Drawn Metal, 1985b. Letter to IEPA Submitting the Closure Plan for the Hazardous Waste Container Storage Area (CSA), January 21.
- Drawn Metal, 1985c. Letter with Material Safety Data Sheets (MSDS) to IEPA Regarding Waste Oil, March 18.
- Drawn Metal, 1985d. Letter to IEPA Regarding Facility's Maximum Quantity Capacity, March 18.
- Drawn Metal, 1985e. Letter with Waste Analysis of Waste Oil to IEPA, September 20.
- Drawn Metal, 1985f. Letter to IEPA with Certified Closure of the Hazardous Waste CSA, October 23.
- Eldredge Engineering Associates (Eldredge), 1985. Letter to Drawn Metal with Closure Certification of Hazardous Waste Storage Area, October 22.
- Federal Emergency Management Agency (FEMA), 1979. Flood Insurance Rate Map for the City of Niles, Cook County, Illinois.
- Hughes, George M., and others, 1966. Bedrock Aquifers of Northeastern Illinois.
- IEPA, 1983. Letter from IEPA to Drawn Metal Regarding Annual Hazardous Waste Reporting System for Treatment, Storage, or Disposal (TSD) Facilities, June 14.
- IEPA, 1984a. IEPA RCRA Compliance Inspection Report for Drawn Metal Facility, July 26.
- IEPA, 1984b. Letter to Drawn Metal Regarding Violations Discovered during the RCRA Compliance Inspection Conducted on July 26, November 16.
- IEPA, 1984c. Letter to Drawn Metal Requesting a Pre-Enforcement Conference Regarding Violations Discovered during the RCRA Compliance Inspection, November 16.
- IEPA, 1984d. Letter to Drawn Metal Regarding the Agreement to Submit the Necessary Documents for the Violations Discovered during the RCRA Compliance Inspection, December 13.
- IEPA, 1985a. Letter to Drawn Metal Regarding Part A Permit Application, Closure Plan, and Waste Analysis of Waste Oil, March 8.
- IEPA, 1985b. Interoffice Memorandum Regarding Drawn Metal's Published Notice of Closure, March 14.

- IEPA, 1985c. IEPA Approved Closure Plan for Drawn Metal Facility, April 1.
- IEPA, 1985d. Letter to Drawn Metal Regarding Necessity of the Waste Oil Analysis, April 22.
- IEPA, 1985e. IEPA Closure Verification Inspection of the Hazardous Waste CSA, October 28.
- IEPA, 1985f. IEPA Approved the Certified Closure of the Hazardous Waste CSA, November 15.
- IEPA, 1986a. IEPA Enforcement Notice Letter to Drawn Metal Requesting an Enforcement Meeting, March 3.
- IEPA, 1986b. IEPA Interoffice Memorandum Regarding the Enforcement Meeting of April 2, April 3.
- IEPA, 1986c. IEPA Letter to Drawn Metal Regarding the Enforcement Meeting of April 2, April 4.
- IEPA, 1986d. IEPA Compliance Letter to Drawn Metal Regarding the Enforcement Meeting on April 2, May 30.
- U.S. Department of Agriculture (USDA), 1976. Soil Survey of DuPage and Cook Counties.
- U.S. Department of Commerce (DOC), 1968. Climatic Atlas of the United States, U.S. Government Printing Office, Washington, D.C.
- DOC, 1980. Statistical Abstract of the United States.
- U.S. Environmental Protection Agency (EPA), 1982. Letter to Drawn Metal Regarding TSD Status without Submitting a Part A Permit Application, September 28.
- United States Geological Survey (USGS), 1980. Topographic Map of Park Ridge Quadrangle, Park Ridge, Illinois, 7.5-Minute Series.

ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE
IL

02 SITE NUMBER
IL.D.000.788.871

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Drawn Metal Products Company (Drawn Metal)		02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER 6143 West Howard Street			
03 CITY Niles	04 STATE IL	05 ZIP CODE 60648	06 COUNTY Cook	07 COUNTY CODE	08 CONG DIST
09 COORDINATES LATITUDE 42°01'10"N		LONGITUDE 87°48'53"W			

10 DIRECTIONS TO SITE (Starting from nearest public road)

From Interstate 90, take Carpenter Road north to West Howard Street and proceed about 1 mile; the facility is on the left.

III. RESPONSIBLE PARTIES

01 OWNER (if known) Jahm, Inc. (Jahm)		02 STREET (Business, mailing, residential) 1155 East Whitcomb Street			
03 CITY Madison Heights	04 STATE MI	05 ZIP CODE 48071	06 TELEPHONE NUMBER (313) 828 - 3710		
07 OPERATOR (if known and different from owner) Same as above		08 STREET (Business, mailing, residential)			
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER		

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE ☐ B. FEDERAL: _____ (Agency Name)
☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER _____ (Specify) ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☒ A. RCRA 3010 DATE RECEIVED: 08/17/92 ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 e) DATE RECEIVED: _____
MONTH DAY YEAR MONTH DAY YEAR ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION		BY (Check all that apply)			
<input checked="" type="checkbox"/> YES DATE 01/28/93	<input type="checkbox"/> NO	<input checked="" type="checkbox"/> A. EPA	<input type="checkbox"/> B. EPA CONTRACTOR	<input type="checkbox"/> C. STATE	<input type="checkbox"/> D. OTHER CONTRACTOR
		<input type="checkbox"/> E. LOCAL HEALTH OFFICIAL	<input type="checkbox"/> F. OTHER _____ (Specify)		
CONTRACTOR NAME: PRC Environmental Management, Inc.					
02 SITE STATUS (Check one)		03 YEARS OF OPERATION			
<input checked="" type="checkbox"/> A. ACTIVE	<input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN	1998 1999 BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN			

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Hazardous waste managed by Drawn Metal include still bottoms containing TCE (F002). The facility also manages nonhazardous waste oil and scrap metal.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

This facility has a low potential for release to environmental media.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☒ C. LOW (Inspect on time-available basis) ☐ D. NONE (No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) EPA		03 TELEPHONE NUMBER (312) 886-4448		
04 PERSON RESPONSIBLE FOR ASSESSMENT Mary Joyce Freibert	05 AGENCY	06 ORGANIZATION PRC	07 TELEPHONE NUMBER 312/886-8700	08 DATE 01/28/93 MONTH DAY YEAR	

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Drawn Metal Products Company (Drawn Metal)
6143 West Howard Street
Niles, Illinois 60648
ILD 000 768 671

Date: January 26, 1993

Primary Facility Representative: Colby Jones, President
Representative Telephone No.: 708/647-8941
Additional Facility Representatives: Donald Tessman, Manufacturing Manager

Inspection Team: Jack Brunner, PRC Environmental Management, Inc. (PRC)
Mary Joyce Freibert, PRC

Photographer: Jack Brunner, PRC

Weather Conditions: Cloudy; 25 °F

Summary of Activities: The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour began at 9:55 a.m. PRC inspected the Hazardous Waste Container Storage Area (CSA) (SWMU 1), Distillation System (SWMU 2), Waste Oil CSA (SWMU 3), Former Waste CSA (SWMU 4), Waste Oil Accumulation Area (SWMU 5), Waste Oil Staging area (SWMU 6), Scrap Metal Accumulation Areas (SWUM 7), and Scrap Metal Storage Areas (SWMU 8).

The tour concluded at 10:25 a.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 11:00 p.m.



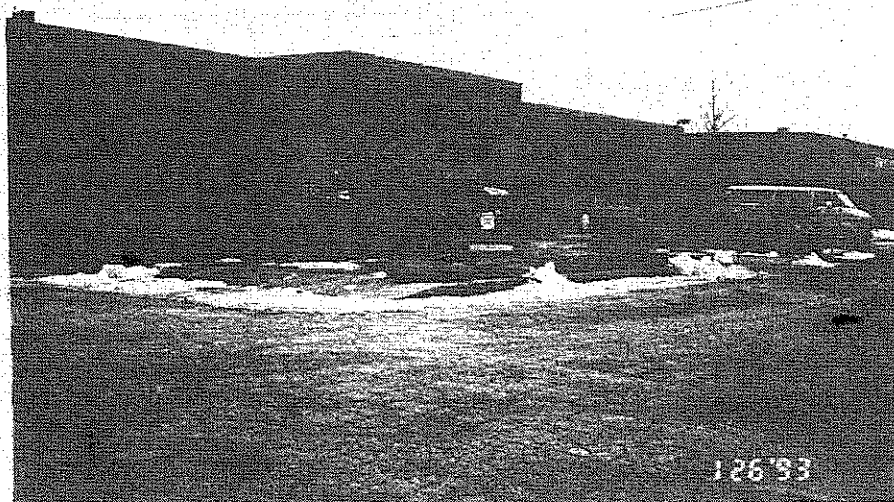
Photograph No. 1

Orientation: North

Description: Hazardous Waste CSA containing three wooden pallets; the area south of the unit contained one 55-gallon drum of still bottoms containing TCE (F002); according to the facility representative, the 55-gallon drum was temporarily stored outside the unit because the unit had recently been shovelled after heavy snowfall during the previous week; area is surrounded by asphalt

Location: SWMU 1

Date: 01/26/93



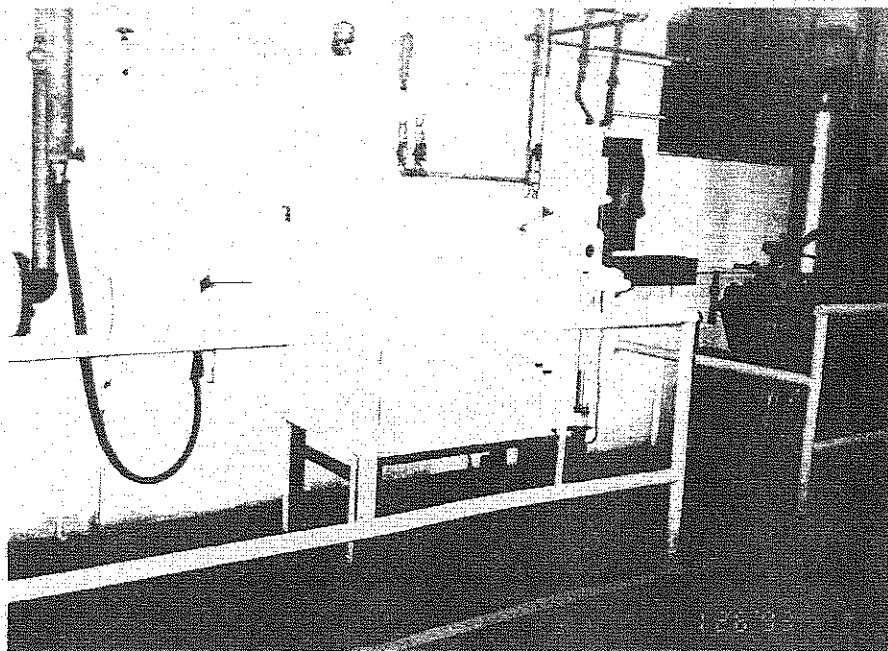
Photograph No. 2

Orientation: Northeast

Description: Area south of the facility that consists of the Hazardous Waste CSA, the Waste Oil CSA, the Former Waste CSA, and one of the Scrap Metal Storage Areas

Location: SWMUs 1, 3, 4, and 8

Date: 01/26/93



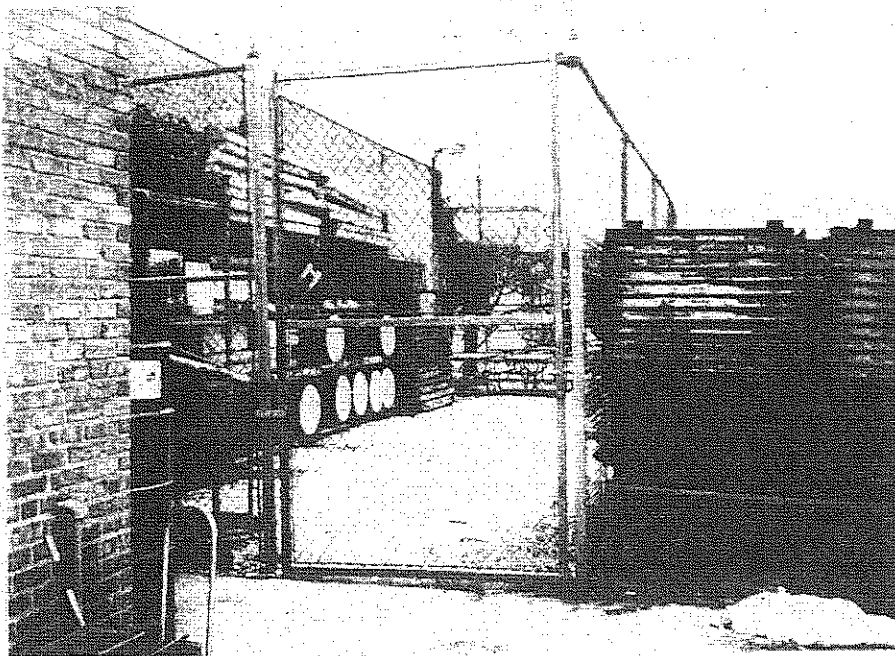
Photograph No. 3
 Orientation: Southeast
 Description: Distillation System

Location: SWMU 2
 Date: 01/26/93



Photograph No. 4
 Orientation: East
 Description: Waste Oil CSA containing 10 55-gallon drums of nonhazardous waste oil; area around the unit is asphalt

Location: SWMU 3
 Date: 01/26/93



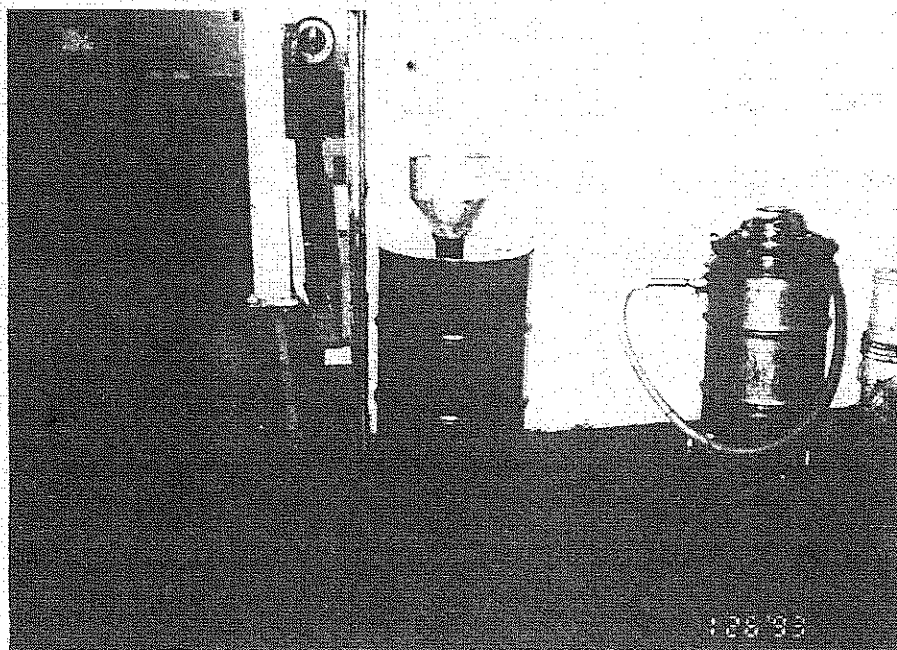
Photograph No. 5

Orientation: East

Description: Former Waste CSA containing seven empty 55-gallon steel drums; PRC noted no stains on the gravel or evidence of spills during the VSI; area around the unit is a concrete pad to the west and southwest and asphalt to the east and south

Location: SWMU 4

Date: 01/26/93



Photograph No. 6

Orientation: South

Description: Waste Oil Accumulation Area containing one partially full, 55-gallon steel drum

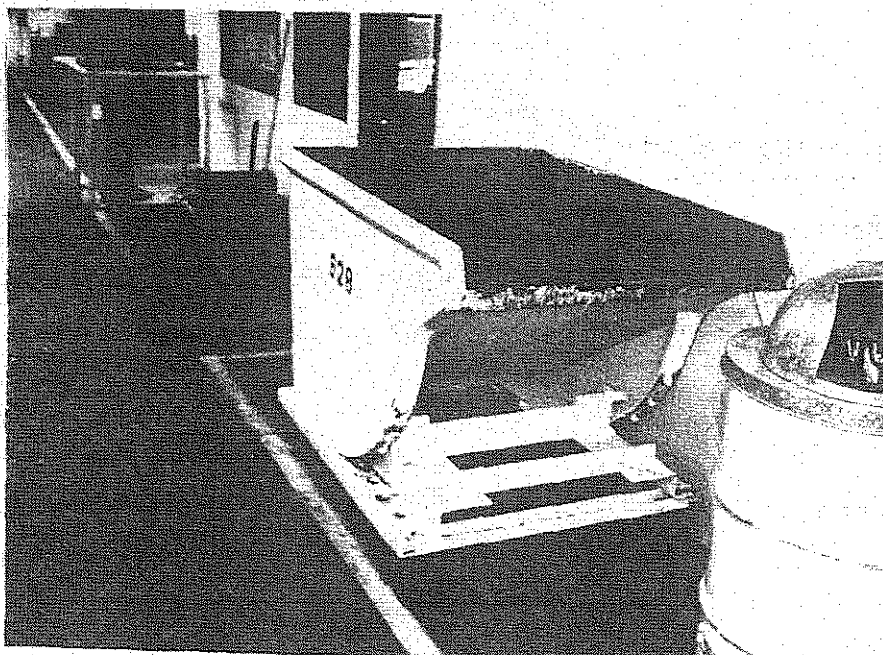
Location: SWMU 5

Date: 01/26/93



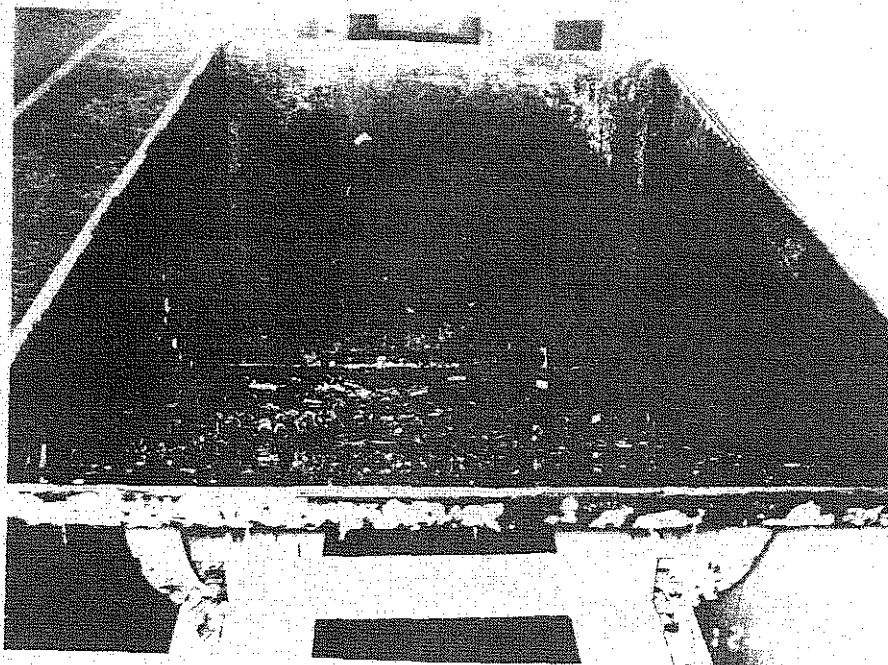
Photograph No. 7
 Orientation: South
 Description: Waste Oil Staging Area containing 14 55-gallon drums of waste oil

Location: SWMU 6
 Date: 01/26/93



Photograph No. 8
 Orientation: South
 Description: One of the Scrap Metal Accumulation Areas with a 1- to 2-cubic-yard container

Location: SWMU 7
 Date: 01/26/93



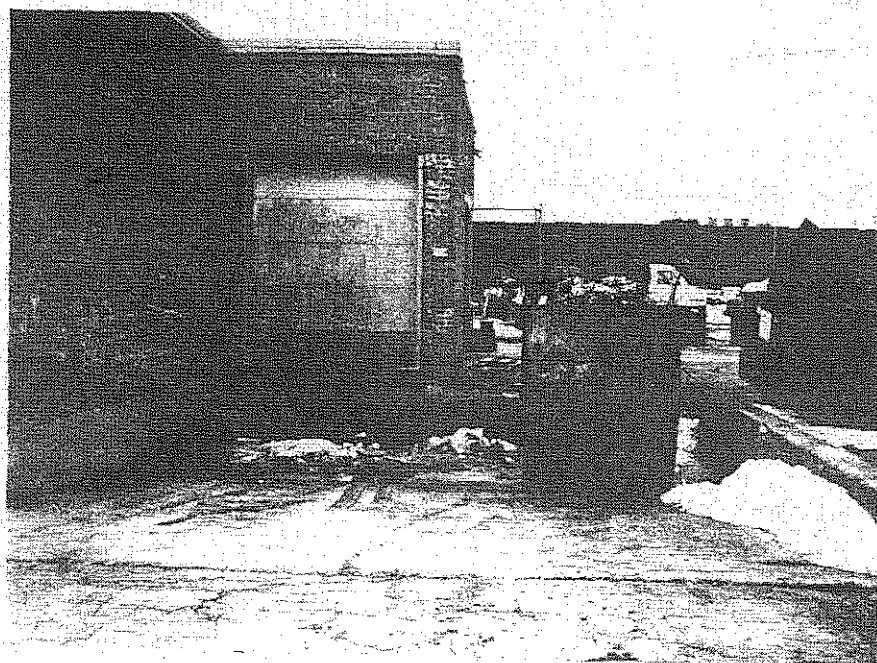
Photograph No. 9

Orientation: South

Description: Scrap metal covered with waste oil in a 1- to 2-cubic-yard container at a Scrap Metal Accumulation Area

Location: SWMU 7

Date: 01/26/93



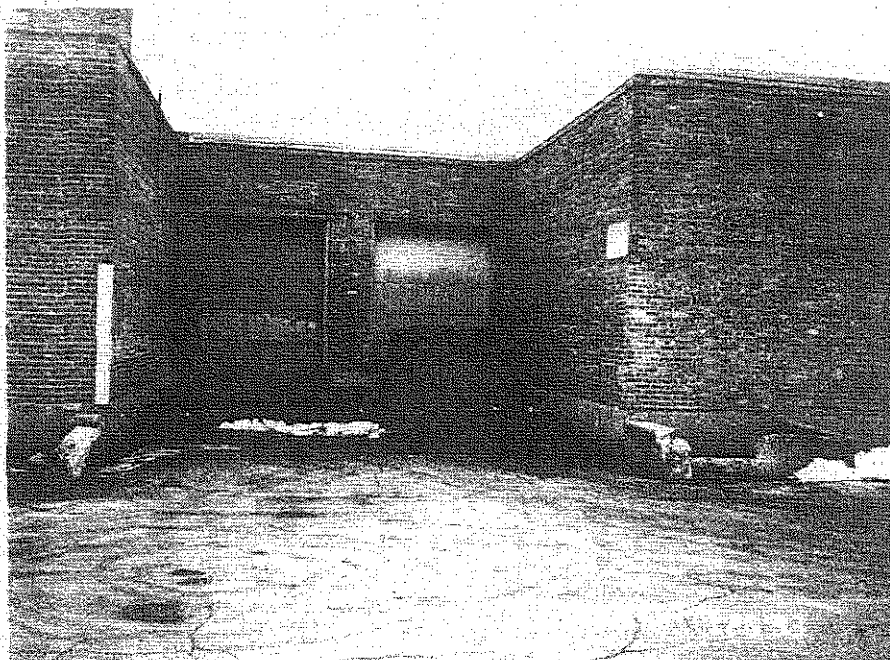
Photograph No. 10

Orientation: East

Description: Scrap Metal Storage Area with nonhazardous waste oil stains on the concrete pad and on the facility's outside wall

Location: SWMU 8

Date: 01/26/93



Photograph No. 1

Orientation: East

Description: Scrap Metal Storage Area with nonhazardous waste oil stains on the concrete pad and on the facility's outside wall

Location: SWMU 8

Date: 01/26/93

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

Q900

1/26/72
DRAW FROM PRODUCTS COPY

HARD 12

IRID 000 708 671

PAUSE

PPL on site

Jack Bruma

Harry Frobert

Clay: 25°F

Met w/ David Tesson & Mary Kung

Q905

Slam on deep down/push pass

- machine stop; stop/review

mostly call call steel (902) - subgr

- same brass, slumbar, etc.

Wichita has 16.2.2.2: doing reports

1/26/72

- 30-40% status on design

- TCE cups designed

separate still

- den still partially

55-gallon drum

- My fuel injection cups

"quickie" can't be for H.C. fuel lines

- 85-70% actuator parts - Ford H.C. copy

- some other products

- ~30 yrs. old

- Post own-ship

- Macdonald: Lewis - of NW industries

- Macdonald only

- Tatham, Inc. - current owner

- 40-45 employees

(3035 MW, 1-1-1-2

other)

1/26/72

(10)

- 2 1/2 hrs; 5 days/week, 2 shifts/week

- NEWEST machine ~ 0.5 inch shaft

- Currently assigned as SAG
TLE skid. → CSA

- 300 gallon TCE product tank

- Most oils
- separate oiler arm

- 100 gallon residue tank at digester

- skid where 4 hr pickup
down to waste

- 1st oil: TCE heavily mixed with
Borex O.I.

- 25 drums (55 gal) 2 months
- lubrication of machine's drum

- From 1st oil skid area - Sept ~ 1988
- currently used to catch skids

- Scrap skid -- Higgins & machine →
roll off bar

- 4th oil skid area ~ 1988 to present

Higgins - 4.5 yd/3
roll off 10-20 yd/3

- Down Hills has been only accept ~ 1986

Jacobson Scrap
roll off / tank

- At VST @ N. facility

- 1981/1983

1983

(11)

(12)

- Will on s.t. -- for press the only

14660 dip

- finally + 14660 dip

- Dark H₂O → et H₂O

→ combined only / stone swans

- H₂ wet St. Area 12-15 yrs ago

- No downward on the history

- Wet Long distance search system to the building

- Retained Swallow

1) H.W. CSA

2) Wet O.I. St. Area

3) From Wet O.I. St. Area (David)

4) Wet O.I. Area

5) Sec. Alth. St. Area (2)

6) Sec. Alth. Area (unp)

7) St. 11

8) Wet O.I. St. Area

0955

Byin. A. 1.5 km

- Sing. Still happens

Wet #1 2

- Col. red. by top of wet

only sing. still happens & wet

- @ dryer - this unit: 200 ft. the

find on bed rock

still is located on side

ad will have dryer

Unit #3 SE

(13)

- typical dry

still happens

Wet #1 2

Wet #3 SE

Wet #3 SE

Wet #3 SE

Wet #3 SE

Wet #3 SE

Wet #3 SE

(104)

- West Oil secant H. Ave

55 yds sh. d. w. H. Ave

- secant H. Ave was about 100 yds

Plot #4 S - West Oil secant H. Ave

- Action will H. Ave

Now Congress Monument

old house - 1128

35 Hill

- D. Ave West Oil Secant H. Ave

in 15 days - kept about

- 1011 H. Ave - "Mach. Wash."



8000 0 0800

8 hours during

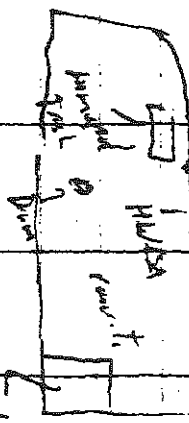
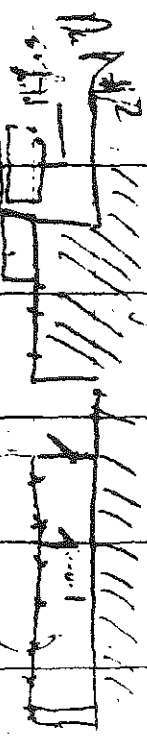
Plot #5 S - West Oil Secant H. Ave

1128/1129

1015 Found near

East Highway

University of Texas, Inc.



West Oil Secant H. Ave

Plot #6 N. H. Ave and secant H. Ave

Plot #7 E. West Oil Secant H. Ave

Plot #8 E. secant West Oil Secant H. Ave

Plot #9 (from West Oil Secant H. Ave)

to secant H. Ave

Plot #10 E. secant West Oil Secant H. Ave

Plot #11 NE - secant H. Ave

1128/1129

(16)

- 1st Mich City Schmitt

2) Deck #1 - Slightly

asphalt on
p. 1 station
and walls

Plot # 11 E - Deck #1 S

work 1 St. M
with will 2 right

N. N. J. - Clark & Associates
Equipment

10:25 Frigate

10:30 Pl. 1 Material P. 1 - Control

11/14/53

(16)

- Jackson Iron & Steel Co. Inc.

Chgo., IL

- owns 11 steel

- call (800) 575

- Brown Al Co.

Hedgins, IL 570 244 410 353

- owns west of - bank road

west of ~~NE 1/4~~ (bank)

- By Brown Al Co. 570 244 410 353

- Decker Corp.

Alcoa P. 1, II

570 074 424 338 6, 1000

- owns sprayer (1500)

- Cable Co. operates ~ 1756 1757

- DHP Co.

pattern - Market owned

11/14/53

Joseph R. 2nd
"Alcoa" of Health
DHP

(100)

1577M NU Alstons built Alstons 1.11.01
its subsidiaries, including DMP

1284 - Alstons built Alstons 1.11.01
NU Alstons Alstons built Alstons 1.11.01

1787 - Taken, Dec. built 3 divisions of
Alstons, including DMP

10:55 Exit Alstons/way-up meeting

1787 Alstons Alstons Jones - President
to Alstons report

17:00 S - A-1 Training Service/Alstons bond
DMP off S. to

Alstons
Alstons

~~Alstons~~
1/20/17

(100)